

UNITED STATES BANKRUPTCY COURT

FOR THE

**EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In the Matter of:

CHRISTOPHER LEITCH

Debtor

Chapter 13
21-11601-KHK

**TRUSTEE'S RESPONSE TO MOTION TO COMPEL TRUSTEE TO
ABANDON PROPERTY**

Thomas P. Gorman, Trustee, notes his opposition to the Motion of Sylvia Leitch to compel pre-confirmation abandonment of the bankruptcy estate's interest in real estate owned or co-owned by Debtor. There is no Plan pending at present so Trustee does not know Debtor's intentions with regards to the subject property, nor what the impact of the pre-confirmation abandonment would be on Movant's filed Proof(s) of Claim.

December 1, 2021
Dated

/s/ Thomas P. Gorman
Thomas P. Gorman
Chapter 13 Trustee
300 N. Washington Street, #400
Alexandria, VA 22314
(703) 836-2226
VSB #26421

CERTIFICATE OF SERVICE

I hereby certify that I have this 1st day of December, 2021 mailed a true copy of the foregoing Response to the following parties.

Robert L. Vaughn, Jr., Esq.
Vaughn Law Firm PLC
1433 New Monrovia Road
Colonial Beach, Virginia 22443

Martin C. Conway, Esq.
Counsel for Debtors
Conway Law Group, PC.
12934 Harbor Drive, Suite 107
Woodbridge, VA 22192

/s/ Thomas P. Gorman
Thomas P. Gorman